



## Office of River Protection Site Action Plan

Commitment 25, Feedback and Improvement  
DNFSB Recommendation 2004-1

*Roy J. Schepens*  
for Approved, Roy J. Schepens, Manager  
Office of River Protection

NOTE: Change Control for this Site Action Plan resides with the Field Office Manager (or designee), with a cc: to EM-3.2.

## Executive Summary

### Evaluation Process

The U.S. Department of Energy (DOE), Office of River Protection (ORP) conducted this assessment in response to Commitment #25 of the DOE's Implementation Plan for Defense Nuclear Facilities Safety Board Recommendation 2004-1, "Oversight of Complex, High-Hazard Nuclear Operations." ORP conducted this assessment in accordance with the instructions provided in DOE Environmental Management (EM) memorandum, Chief Operating Officer for Environmental Management to Distribution, "Feedback and Improvement Assessments and Site Action Plans for Defense Nuclear Facilities Safety Board Recommendation 2004-1, Commitment 25," dated November 17, 2005. Specific direction was provided to perform a review of the DOE field office and contractor in the area of Feedback and Improvement (F&I). The assessment team determined that a combination of existing assessment data and conduct of a new assessment would be required to fully evaluate all F&I processes used by ORP and ORP prime contractors.

The assessment is the product of a joint effort of ORP and the three ORP prime contractors, CH2M HILL Hanford Group, Inc., (CH2M HILL), Bechtel National Inc. (BNI), and Advanced Technologies and Laboratories International, Inc. (ATL). The team consisted of one member each from these contractors and was led by a representative of ORP. Generally, the contractor members evaluated the F&I processes of their own companies, with oversight from the ORP team lead. The ORP representative also evaluated the ORP F&I processes.

The assessment team used the criteria and review approach documents (CRAD) specified in the EM memorandum. The team found the criteria in the CRADs were straightforward, which facilitated efficient conduct of the assessment. The assessment team compared the criteria to existing processes and identified gaps, reviewed previous internal and external assessments, and addressed effective implementation of existing requirements.

ORP, CH2M HILL, and BNI had existing F&I processes intended to respond to contract requirements. ATL, a new contractor, was still in the process of finalizing its F&I processes. For ATL, the assessment team compared existing and scheduled procedures to the CRADs, and only documented issues where the existing and scheduled procedures failed to address a criterion. There was insufficient ATL F&I activity to assess implementation of its F&I processes. Following approval of the ATL Integrated Safety Management System (ISMS) description, ORP will conduct phased verification of ISMS.

In addition to the opportunities for improvement (OFI) identified by the assessment team, ORP and its contractors identified supplemental OFIs associated with Human Performance Improvement (HPI). We plan to train our staffs on the principles of HPI and apply these principles to improve our feedback and improvement processes.

## Overall Evaluation Summary

The assessment team found that ORP, CH2M HILL, and BNI had processes that complied with existing contract requirements, even though they did not satisfy all CRAD criteria. The assessment team concluded that the CRAD criteria that were not implemented at the time of the assessment represented new requirements in DOE O 226.1, "Implementation of Department of Energy Oversight Policy." None of the contractors had been directed to implement the new order, pending F&I workshops scheduled for Spring 2006. There was a range of opinions among the ORP contractors regarding the cost of implementing new requirements, and ORP contractors were awaiting clarification of requirements in the workshops before going ahead with implementation. However, at the time of the assessment, ORP was already in the process of revising its own oversight procedures to implement DOE O 226.1.

The assessment team identified a total of six OFIs.

<u>CRAD #</u>	<u>Objective Met</u>	<u>Objective Partially Met</u>	<u>Objective Not Met</u>	<u>Comments</u>
1	X			Five OFIs Noted
2	X			No OFIs Noted
3	X			Two OFIs Noted

ORP and the ORP contractors subsequently identified three supplemental OFIs addressing human performance improvement that did not flow directly from the assessment CRADs.

The F&I assessment was documented in ORP memorandum, R. J. Schepens to J. R. Triay, EM-2, "U.S. Department of Energy, Office of River Protection, Feedback and Improvement Assessment Report," 05-ESQ-094, dated December 29, 2005.

## Action Plan Organization

Sections I-III contain those actions important to improving the effectiveness of F&I.

Section IV contains F&I "Good Practices" for sharing across the DOE.

Section VI contains the supplemental OFIs identified by ORP and the ORP contractors.

## SECTION I – DOE Oversight

### Performance Objective F&I-3: DOE Line Management Oversight

#### Opportunity for Improvement: F&I-ORP-OFI-1

ORP M 220.1, "Integrated Assessment Program," should be revised to explicitly address oversight of all features of contractor assurance systems specified in DOE O 226.1, including cyber security, business processes, and safeguards and security.

ORP Action	Deliverable	Due Date	Owner/Org
a. Revise ORP M 220.1 to explicitly address oversight of all features of contractor assurance systems, including cyber security, business processes, and safeguards and security.	Revised ORP M 220.1	January 5, 2006  (Completed)	Patrick P. Carier / Office of Environmental Safety and Quality
b. Revise ORP M 220.1 to address oversight of other feedback systems, such as worker feedback. It should also be revised to comprehensively address oversight of communication of information, such as dissenting opinion.	Revised ORP M 220.1	January 5, 2006  (Completed)	Patrick P. Carier / Office of Environmental Safety and Quality
c. Revise ORP M 220.1 to describe a process for resolving professional disagreements over assessment issues, including provisions for independent technical reviews for significant findings.	Revised ORP M 220.1	January 5, 2006  (Completed)	Patrick P. Carier / Office of Environmental Safety and Quality

d. Revise ORP M 220.1 to the requirements for ORP oversight of contractor employee concerns processes.	Revised ORP M 220.1	January 5, 2006  (Completed)	Patrick P. Carier / Office of Environmental Safety and Quality
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**Responsible Manager: Robert Barr / Director, Office of Environmental Safety and Quality**

**Opportunity for Improvement F&I-ORP-OFI-2**

Facility Representative requirements and procedures should be revised to implement requirements of DOE O 226.1.

ORP Action	Deliverable	Due Date	Owner/Org
a. Revise Facility Representative Instructions to include provisions for: 1) resolving professional disagreements over assessment issues (i.e. minority opinions); and 2) consideration for independent technical reviews for significant findings.	Revised Facility Representative Instructions	March 31, 2006	Mark C. Brown, Tank Farm Operations Division (Responsible for all Facility Representative Instructions)

**Responsible Manager: T. Zack Smith / Assistant Manager, Tank Farms Project**

## SECTION II – CH2M HILL

### Performance Objective F&I-1: Contractor Program Documentation

#### Opportunity for Improvement F&I-CH2-OFI-1

CH2M HILL has implemented the required elements of an assurance system and some elements, such as the Quality Assurance Program Description document, have been approved by DOE. However, a single program description document that fully details the programs and processes that comprise the assurance system has not been developed, approved by contractor management, and forwarded to DOE for review and approval.

CH2M HILL Action	Deliverable	Due Date	Owner/Org
a. Attend Headquarters (HQ)-sponsored workshops on implementation of DOE O 226.1.	Workshop attendance	Spring 2006	Richard L. Higgins / Assessment & Corrective Actions
b. Submit a detailed contractor assurance system program description to ORP for approval.	Contractor assurance program description	October 1, 2006	Richard L. Higgins / Assessment & Corrective Actions

**Responsible Manager:** Richard L. Higgins / Manager, Assessment & Corrective Actions

### Performance Objective F&I-2: Contractor Program Implementation

No opportunities for improvement noted at this time.

## SECTION III – BNI

### Performance Objective F&I-1: Contractor Program Documentation

#### Opportunity for Improvement F&I-BNI-OFI-1

BNI cannot determine the impact of developing a complete contractor assurance system until the DOE implementation manual/workshops for DOE O 226.1 are provided and a detailed gap analysis can be performed.

BNI Action	Deliverable	Due Date	Owner/Org
a. Attend HQ-sponsored workshops on implementation of DOE O 226.1.	Workshop attendance	Spring 2006	George T. Shell / Quality Assurance Department
b. Receive ORP direction to implement DOE O 226.1. (ORP to provide, based on outcome of workshops.) Based on the outcome of the workshops, perform gap analysis for implementation of DOE O 226.1.	Gap analysis for DOE O 226.1.	60 days following workshop	George T. Shell / Quality Assurance Department

Responsible Manager: George T. Shell / Manager, Quality Assurance Department

#### Opportunity for Improvement F&I-BNI-OFI-2

Hanford Tank Waste Treatment and Immobilization Plant (WTP) assurance activities may not encompass WTP subcontractor activities to the degree required by Appendix A to the Contractor Requirements Document of DOE O 226.1, "Implementation of Department of Energy Oversight Policy."

BNI Action	Deliverable	Due Date	Owner/Org
a. Issue implementation plan for DOE O 226.1.	Implementation plan	30 days following completion of GAP analysis	George T. Shell / Quality Assurance Department
b. Submit to ORP for approval revised or new assurance system	Assurance system description(s) addressing all requirements of DOE O 226.1	8/14/06	George T. Shell / Quality Assurance

description(s) addressing all requirements of DOE O 226.1, Appendix A.			Department
c. Complete implementation of DOE O 226.1.	Letter to ORP confirming implementation	9/14/06	George T. Shell / Quality Assurance Department

**Responsible Manager:** George T. Shell / Manager, Quality Assurance Department

**Opportunity for Improvement F&I-BNI-OFI-3**

WTP assurance activities may not encompass WTP business operations to the degree required by Appendix A to the Contractor Requirements Document of DOE O 226.1, "Implementation of Department of Energy Oversight Policy."

BNI Action	Deliverable	Due Date	Owner/Org
a. Submit to ORP for approval revised or new assurance system description(s) addressing business operations assurance system requirements of DOE O 226.1, Appendix A. (With BNI commitment F&I-BNI-OFI-2.b)	Assurance system description(s) addressing business operations assurance system requirements of DOE O 226.1, Appendix A.	8/14/06	George T. Shell / Quality Assurance Department
b. Complete implementation of DOE O 226.1, including requirements for business operations assurance systems. (With BNI commitment F&I-BNI-OFI-2.c.)	Letter to ORP confirming implementation	9/14/06	George T. Shell / Quality Assurance Department

**Responsible Manager:** George T. Shell / Manager, Quality Assurance Department

**Performance Objective F&I-2: Contractor Program Implementation**

No opportunities for improvement noted at this time.



**SECTION IV – ATL****Performance Objective F&I-1: Contractor Program Documentation****Opportunity for Improvement F&I-ATL-OFI-1**

ATL does not have a procedure for causal analysis.

<b>ATL Action</b>	<b>Deliverable</b>	<b>Due Date</b>	<b>Owner/Org</b>
a. Issue a procedure for causal analysis.	Procedure for causal analysis	3/1/06	Phyllis H. Bruce / Contract Assurance Program

**Responsible Manager:** Phyllis H. Bruce / Contract Assurance Program Manager

**Performance Objective F&I-2: Contractor Program Implementation**

No opportunities for improvement noted at this time.

**SECTION V – ORP Site F&I Good Practices**

Good Practice(s)	Site Point of Contact
<p><b>Good Practice #1:</b> ORP's oversight procedure includes tables specific to each contractor that comprehensively specify all DOE assessment requirements applicable to the contractor. The tables were developed from systematic reviews of contract requirements, regulations, and DOE directives.</p> <p>ORP found these tables are extremely valuable in developing annual assessment plans by assuring required assessments are always included.</p>	Patrick P. Carier (509) 376-3574
<p><b>Good Practice #2:</b> ORP senior management is active in the assessment program. The Assessment Program Committee, which includes the Deputy Manager, meets quarterly. During quarterly meetings, management evaluates the past years ORP's reports, PAAA activities and assessment findings and observations to identify trends. When trends are identified the assessment plan is revised to assess weak areas.</p>	Patrick P. Carier (509) 376-3574
<p><b>Good Practice #3:</b> CH2M HILL enters DOE Lessons Learned, Safety Notices, Safety Bulletins, and Data Collection Sheets into its issues management system, the Problem Evaluation Request system. This documents the review of each issue by the appropriate subject matter experts and tracks actions taken in response.</p>	Richard Higgins (509) 373-5305
<p><b>Good Practice #4:</b> Senior CH2M HILL managers review the results of internal and external assessments as part of bi-weekly Executive Safety Review Board meetings.</p>	Richard Higgins (509) 373-5305
<p><b>Good Practice #5:</b> CH2M HILL assessment schedules and copies of assessments are available on the company's intranet for retrieval by employees.</p>	Richard Higgins (509) 373-5305

<b>Good Practice #6:</b> The BNI Quality Assurance Information System's user-friendly design and standard reporting features permit ready and consistent retrieval of corrective action information for analysis and development of quality-related performance indicators.	George T. Shell (509)371-2377
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## SECTION VI – Supplemental Goals

### Supplemental Goal F&I-1: Human Performance Improvement (HPI)

#### Opportunity for Improvement F&I-ORP-SUPOFI-1

ORP and its contractors should implement human performance improvement programs.

ORP Action	Deliverable	Due Date	Owner/Org
a. Develop and approve a joint ORP/Prime Contractor HPI strategic plan that addresses the eight initiatives of the HPI leadership framework.	Approved strategic plan	June 1, 2006	Shirley J. Olinger / DEP
b. Train ORP Facility Representatives and supervisors on HPI principles and techniques.	Lesson plans and training rosters	September 1, 2006	Shirley J. Olinger / DEP
c. Provide contract direction to BNI, CH2M HILL, and ATL for implementing the strategic plan. Resolve funding issues, identify achievable dates, identify performance measures.	Contract changes for CH2M HILL, BNI, and ATL	September 30, 2006	For CH2M HILL and ATL: Dana Bryson / AMTF  For BNI: Mike Thomas / AMWTP

Responsible Manager: Shirley Olinger / Deputy Manager